

THE HONORABLE JAMES L. ROBERT

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

CITY OF SEATTLE,

Defendant.

No. 2:12-cv-01282-JLR

**DECLARATION OF STEPHEN RUSHIN IN
SUPPORT OF THE UNITED STATES’
RESPONSE TO THE COURT’S ORDER TO
SHOW CAUSE**

I, Stephen Rushin, declare as follows:

1. I am an Assistant Professor of Law at Loyola University in Chicago, Illinois. I teach Criminal Law, Evidence, and Police Accountability. I am over the age of 18 and competent to testify in court about the matters stated herein.

2. I am the author of a law review article that will be published in the University of Pennsylvania Law Review in 2019 entitled “Police Disciplinary Appeals.” In the course of researching that article, I compiled a database of more than 650 collective bargaining agreements (“CBAs”) entered between police unions and municipalities from across the United States.

I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct to the best of my knowledge.

Executed this 13th day of February, 2019.

Stephen Ruse

Professor Stephen Rushin

CERTIFICATE OF SERVICE

I hereby certify that on February 13, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which sends notification of such filing to the following counsel of record:

Annette L Hayes	Annette.Hayes@usdoj.gov
Christina Fogg	Christina.Fogg@usdoj.gov
Gregory Colin Narver	gregory.narver@seattle.gov
Kerry Jane Keefe	kerry.keefe@usdoj.gov
Peter Samuel Holmes	peter.holmes@seattle.gov
Jeff Murray	jeff.murray@usdoj.gov
Rebecca Boatright	rebecca.boatright@seattle.gov
Ronald R. Ward	Ron@wardsmithlaw.com
Timothy D. Mygatt	timothy.mygatt@usdoj.gov
Michael K. Ryan	michael.ryan@seattle.gov
Carlton Seu	carlton.seu@seattle.gov
Gary T. Smith	gary.smith@seattle.gov
Hillary H. McClure	hillarym@vjmlaw.com
Kristina M. Detwiler	kdetwiler@unionattorneysnw.com

DATED this 13th day of February, 2019, at Seattle, King County, Washington.

s/Brittany Cirineo
Brittany Cirineo, Legal Assistant (Contractor)